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REGULATORY AUTH.
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OFFICE OF THE
EXECUTIVE SECRETARY

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December 22, 1997

VIA HAND-DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Application of Electric Power Board of Chattanooga
for a Certificate of Public Convenience and Necessity
to Provide Intrastate Telecommunications Services
TRA Docket No. 97-07488

Dear Mr. Waddell:

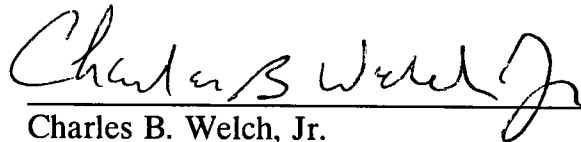
Enclosed for filing, please find the original plus thirteen (13) copies of the Statement of Issues in the above-referenced proceeding to be filed on behalf of the Tennessee Cable Telecommunications Association. Copies are being served on parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

FARRIS, MATHEWS, BRANAN & HELLEN, P.L.C.

By:


Charles B. Welch, Jr.

CBW,jr:cg
Enclosures
cc: Stacey Burks
Parties of Record

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

DEC 22 PM 4 06
'97

IN RE:

**APPLICATION OF ELECTRIC
POWER BOARD OF CHATTANOOGA
FOR A CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY
TO PROVIDE INTRASTATE
TELECOMMUNICATIONS SERVICES**

**OFFICE OF THE
EXECUTIVE SECRETARY**

Docket No. 97-07488

**STATEMENT OF ISSUES ON BEHALF OF THE
TENNESSEE CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to the "Notice of Pre-Hearing Conference" dated December 15, 1997, the Tennessee Cable Telecommunications Association. ("TCTA") respectfully submits the following statement of issues in this case:

1. Is the Electric Power of Chattanooga ("EPB") in compliance with all applicable provisions of Part 2 of Chapter 4 of Title 65 of the Tennessee Code Annotated?
2. Is the EPB presently capable of complying with all existing policies, rules, and orders of the Tennessee Regulatory Authority in the same manner and to the same extent as other certificated providers of telecommunications services including, without limitation, rules or orders governing anti-competitive practices?
3. What portion of the EPB's electric plant is to be allocated to telecommunications services and how will the costs be allocated to

telecommunications services for regulatory purposes?

4. What rules and/or reporting requirements are necessary to ensure EPB's compliance with TCA §7-52-402(2)?

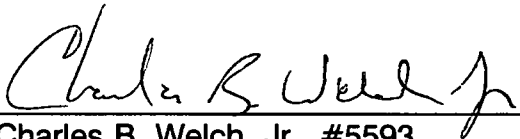
5. What rules are necessary to ensure EPB's compliance with TCA §7-52-404?

What reporting requirements are necessary?

6. What rules and/or reporting requirements are necessary to ensure EPB's compliance with TCA §7-52-405?

Respectfully submitted,

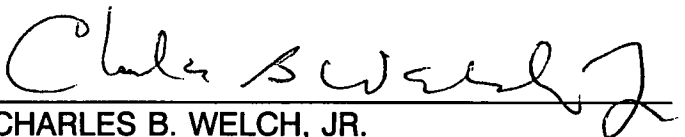
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BY: 

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CERTIFICATE OF SERVICE

I, CHARLES B. WELCH, JR., hereby certify that I have served a copy of the foregoing Petition for Leave to Intervene on the parties on the attached list, by depositing copy of same in the U. S. Mail, postage prepaid this 22nd day December, 1997.


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